

IN THE JUVENILE COURT OF CATOOSA COUNTY

STATE OF GEORGIA

IN THE INTEREST OF:

**Haley Singleton**

14	02/15/2001	Female	2015-J- <u>380</u>
Age	DOB	Sex	Case No.
A Child Under 18 Years of Age.			

**PETITION**

(DEPENDENCY)

1. Your Petitioner alleges the child named above to be of the sex and age and to have the name there set forth above; that the legal father of said child is Walter Bernard Singleton, whose whereabouts is unknown; the mother of said child is Jennifer Singleton, whose location is being withheld per Order of the Court;

Said child is subject to the jurisdiction of this Court.

Said child was physically present in Catoosa County and the acts alleged below underlying this dependency action are alleged to have occurred in Catoosa County.

2. Said child is dependent (O.C.G.A. Section 15-11-2(22)) due to the following conditions: said child has been abused or neglected and is in need of the protection of the Court, and/or said child has been placed for care or adoption in violation of law, and/or said child is without the child's parent.

A. All allegations in the Complaint filed in this case are incorporated herein by reference.

The Department was notified in the morning of September 4, 2015, due to the child coming to school with a bruise above her eye and bruise on her arm.

The school had previously received a call from the mother the day before stating that the child gets into fights with her brother.

The Department made an initial response in the morning and the child did not make any disclosures.

JUVENILE COURT  
CATOOSA COUNTY, GA  
FILED IN OFFICE

*September 10, 2015* at *10:15* P.M.  
*Kim Earnest*  
CLERK/DEPUTY CLERK

At 2:45 p.m., it was reported to the Department that the child stated that she was afraid to go home. Case Manager Baldrige arrived at the school to speak with the child and observed the bruises on the child's arm and eye. The child allowed the bruises to be photographed. The child stated that she had a bruise on her chest but did not want to show that to the case manager.

The child reported that she, her mother, her grandmother and her brothers got into an altercation. Case Manager Baldrige asked the child about the bruise around her eye; at that time the child did not answer but stated that she was afraid to go home.

Detective Blevins from Fort Oglethorpe Police was called to the school at that time.

The Grandmother arrived at the school after the mother was notified of the situation; the mother was at work. The Grandmother said that she and the mother had to restrain child on Sunday because the child attacked her disabled Grandfather.

The Mother arrived at the school and stated that there was an altercation between the child and her brothers on Friday and the mother had to restrain the child.

The Mother also said that she and the grandmother and the brother restrained the child on Saturday and that the grandfather got hit while they were restraining.

The Mother showed Case Manager Baldrige and Detective Blevins a video of her sitting on the child to restrain her and child is screaming at the mother to stop.

The Mother and Grandmother were not able to account for how the child got the black eye.

Case Manager Baldrige and Detective Blevins spoke to the child again. The child stated that when she gets upset she tried to cope and use the techniques from counseling but she cannot do that because her Mother has taken her art and taken her writings and will not let her walk away.

The Child stated that when she was being restrained on Sunday, her mother reached under her arm and punched her in the eye and that is how she got the bruise around her eye.

The Child stated that again that she was fearful of going home and she was also fearful of going with her grandmother.

The mother and the grandmother left the school while Case Manager Baldrige was waiting to hear about emergency custody of the child.

The mother has stated that her husband abused her and her children and was in prison in Florida for Felony child abuse. She stated that he has stalked the family in the past and that she is afraid of him. She stated there is a No Contact Order / Injunction against him having contact with her or her children in the State of Florida.

B. There are no current allegations of substance abuse.

C. It is the belief of representatives of the Catoosa County Department of Family and Children Services ("DFCS") that if DFCS is not awarded temporary custody and control of the above-named minor child that there is a substantial likelihood that said child will suffer serious physical, mental, moral or emotional harm.

D. Continued placement of the child in the home is contrary to the welfare of the child. Reasonable efforts have been made by DFCS to preserve and reunify the family prior to the placement of the child in foster care, to prevent or eliminate the need for removing the child from the child's home, and to make it possible for the child to safely return to the child's home. DFCS has made reasonable efforts to eliminate the need for removal of the dependent child from the child's home and to reunify the child with the child's family at the earliest possible time.

E. Petitioner requests that the Court appoint a Guardian Ad Litem and an Attorney to represent the said minor child.

3. That it is in the best interest of the child and the public that this proceeding be brought.

4. That said child is currently in the protective custody of the Catoosa County Department of Family and Children Services and was placed in foster care on the 4th day of September, 2015.

5. The following information required by O.C.G.A. Section 15-11-152, is not known at the time of the filing of this petition: the location of the father

Petitioner prays that process issue, directed to the parties hereto, requiring them to appear before this Court to answer the allegations of this Petition.

Respectfully submitted, this 8 day of September, 2015.

**SAMUEL S. OLENS**

551540

Attorney General

**DENNIS R. DUNN**

234098

Deputy Attorney General

**SHALEN S. NELSON**

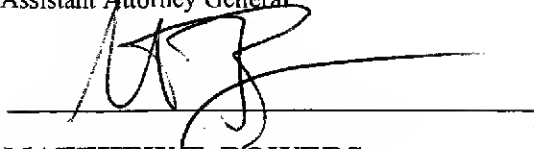
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Senior Assistant Attorney General

**PENNY L. HANNAH**

323563

Assistant Attorney General

A handwritten signature in black ink, appearing to read 'MTB', is written over a horizontal line.

**MATTHEW T. BOWERS**

797235

**KATHLEEN V.P. GIBSON**

835721

Special Assistant Attorney General

Representing Catoosa County Department of

Family and Children Services

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VERIFICATION

Personally appeared before the undersigned Notary Public the below named Case Manager for the Catoosa County Department of Family and Child Services who, after first being duly sworn on oath, deposes and says that the facts and information contained in the within and foregoing Petition are true and correct based upon knowledge, information and belief.

Kirbi Baldridge  
Kirbi Baldridge, Catoosa County, DFCS

Subscribed and affirmed, or sworn to before me in the County of Catoosa, State of Georgia, this 8th day of September 2015.

Julia A. Hester  
Notary Public  
My Commission Expires: 05-16-2017  
FALKER COUNTY, GEORGIA

ENDORSEMENT

The above Petition is approved to be filed in the best interest of the public and the named child.

This 10<sup>th</sup> day of September, 2015.

Dunmy M. Hard  
(Court Designee)